

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
PLAINTIFF ALYAS; PLAINTIFF MARCOS;
PLAINTIFF AHMED; PLAINTIFF RACHEL;
PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; ROBERT F.
KENNEDY, JR., in his official capacity as
Secretary of Health and Human Services,

Defendants.

Case No. 2:25-cv-255-JNW

**[PROPOSED] ORDER FOR
DEFENDANTS TO SHOW CAUSE;
ORDER FOR ENFORCEMENT
AND REPORTING ON
COMPLIANCE**

Having considered Plaintiffs' motion to enforce the Court's first preliminary injunction (Dkt. Nos. 39 and 45), it is hereby **ORDERED** that:

1. Defendants show cause why the Court should not conclude that they are in violation of the first preliminary-injunction order as narrowed by the Ninth Circuit. Plaintiffs have demonstrated that an immediate show cause hearing is necessary, prior to any

[PROPOSED] ORDER
(No. 2:25-cv-255-JNW)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000

1 further briefing on their motion, and, accordingly, a show cause hearing is
 2 scheduled for April __, 2025. Defendants are ordered to produce agency witness(es)
 3 who can testify to Defendants' compliance with the first preliminary-injunction
 4 order.

5 2. Defendants restore, by April __, 2025, the *status quo ante litem* of refugee
 6 processing and admissions as of January 19, 2025 for those individuals who were
 7 conditionally approved for refugee status.

8 3. On April __, 2025, and every calendar day thereafter, until such time as the Court
 9 determines that Defendants have sufficiently complied with the first preliminary-
 10 injunction order such that daily reporting is no longer necessary, Defendants shall
 11 submit a status report detailing their efforts to comply with the first preliminary-
 12 injunction order. Each status report shall:

13 a. Describe actions Defendants have taken since the prior day's status report
 14 on each of the following:

15 i. Processing the U.S. Refugee Admissions Program ("USRAP")
 16 cases of Plaintiffs Pacito, Sara, Alyas, Marcos, and Ahmed;

17 ii. Processing the USRAP cases of applicants conditionally approved
 18 for refugee status as of January 19, 2025, including both principal
 19 refugee applicants and follow-to-join ("FTJ") beneficiaries;

20 iii. Restarting operations of Resettlement Support Centers ("RSCs")
 21 that have not been terminated; and

22 iv. Processing cases handled from terminated and/or suspended RSCs.

23 b. Identify the number of cases, with respect to each RSC (including both
 24 "operative" and terminated and/or suspended RSCs), that:

25 i. Had travel cancelled after January 19, 2025, and of those, the
 26 number with travel rebooked; and

ii. Were ready for travel on January 19, 2025, and of those, the number with travel booked in the first instance.

c. Identify the number of conditionally approved FTJ cases as of January 19, 2025 that:

i. Have been deemed travel-ready following the completion of processing; and

ii. Have been provided with travel documentation.

IT IS SO ORDERED.

Dated this ____ day of April, 2025.

United States District Judge

Presented by:

s/ Harry H. Schneider, Jr.

Harry H. Schneider, Jr., WSBA No. 9404
Jonathan P. Hawley, WSBA No. 56297
Shireen Lankarani, WSBA No. 61792
Esmé L. Aston, WSBA No. 62545

PERKINS COIE LLP

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Telephone: (206) 359-8000
Facsimile: (206) 359-9000
HSchneider@perkinscoie.com
JHawley@perkinscoie.com
SLankarani@perkinscoie.com
EAston@perkinscoie.com

John M. Devaney*

PERKINS COIE LLP

700 Thirteenth Street NW, Suite 800
Washington, D.C. 20005
Telephone: (202) 654-6200
Facsimile: (202) 654-6211
JDevaney@perkinscoie.com

Joel W. Nomkin*

PERKINS COIE LLP

2525 East Camelback Road, Suite 500
Phoenix, Arizona 85016
Telephone: (602) 351-8000
Facsimile: (602) 648-7000
JNomkin@perkinscoie.com

Nicholas J. Surprise*

PERKINS COIE LLP

33 East Main Street, Suite 201
Madison, Wisconsin 53703
Telephone: (608) 663-7460
Facsimile: (608) 663-7499
NSurprise@perkinscoie.com

Counsel for Plaintiffs

** Admitted pro hac vice*

Deepa Alagesan*

Mevlûde Akay Alp*

Linda Evarts*

Ghita Schwarz*

**INTERNATIONAL REFUGEE
ASSISTANCE PROJECT**

One Battery Park Plaza, 33rd Floor
New York, New York 10004
Telephone: (646) 939-9169
Facsimile: (516) 324-2267
dalagesan@refugeerights.org
makayalp@refugeerights.org
levarts@refugeerights.org
gschwarz@refugeerights.org

Melissa Keaney*

**INTERNATIONAL REFUGEE
ASSISTANCE PROJECT**

P.O. Box 2291
Fair Oaks, California 95628
Telephone: (646) 939-9169
Facsimile: (516) 324-2267
mkeaney@refugeerights.org

Laurie Ball Cooper*

Megan McLaughlin Hauptman*

**INTERNATIONAL REFUGEE
ASSISTANCE PROJECT**

650 Massachusetts Avenue NW, Suite 600
Washington, D.C. 20001
Telephone: (516) 732-7116
Facsimile: (516) 324-2267
lballcooper@refugeerights.org
mhauptman@refugeerights.org

CERTIFICATE OF SERVICE

I certify under penalty of perjury that on April 3, 2025, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Dated: April 3, 2025

s/ Harry H. Schneider, Jr.
Harry H. Schneider, Jr.